

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

ERNEST KEVIN TRIVETTE, ET AL.,

Plaintiffs,

v.

TENNESSEE DEPARTMENT OF
CORRECTION,

Defendant.

Case No.: 3:20-cv-00276

Honorable Aleta Trauger

NOTICE OF SETTLEMENT AND CONTINUING JURISDICTION

Plaintiffs Alex Gordon Stinnett, Thomas White, Lakeevious Owens, and Disability Rights Tennessee (“DRT”) hereby notify the Court that they have entered a binding settlement agreement with the Tennessee Department of Correction (“TDOC”) to resolve all remaining claims in this matter. The Agreement is attached hereto as Exhibit A.¹

In the Agreement, TDOC commits to provide appropriate auxiliary aids and services and reasonable accommodations so that deaf prisoners have an equal opportunity to participate in and benefit from TDOC services, programs, and activities. (Agreement § 2(b).)

Specifically, TDOC will provide sign language interpreters for crucial interactions such as intake and orientation, medical and mental health appointments, educational and vocational programming, religious services, and discipline and parole-related proceedings. (*Id.* § 5.) TDOC will also provide videophones at every facility housing a deaf prisoner as well as at intake facilities. (*Id.* § 7.)

To ensure that deaf prisoners are identified and provided with the auxiliary aids and

¹ While the monetary payments to the individual plaintiffs are not confidential, they have been redacted from this filing for the Plaintiffs’ safety.

services they need, TDOC will screen all incoming prisoners as well as older prisoners and those who request a screening. (Agreement § 3.) For prisoners who are deaf, TDOC will then conduct an individualized accommodation needs assessment to determine the technology and services necessary to ensure effective communication and access to services. (*Id.* § 4.)

The Agreement became effective on March 4, 2025 when TDOC informed Plaintiffs of approval by all appropriate state officials (*see id.* § 16); and shall continue in force for a term of two years, until March 4, 2027 (*id.* § 18). The Parties have agreed that this case be administratively closed, but that the United States District Court for the Middle District of Tennessee shall retain continuing jurisdiction to reopen this civil action throughout the duration to enforce its provisions. (*Id.* §§ 15(c), 17.) Upon termination of the Agreement, the Parties will sign and submit a joint stipulation of dismissal with prejudice pursuant to Fed. R. Civ. P. 41(a), thereby ending the Court's jurisdiction over this case. (*Id.* § 17.)

Respectfully submitted,

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March 4, 2025

CERTIFICATE OF SERVICE

I certify that, on March 4, 2025, I served the foregoing document upon all parties herein by e-filing with the CM/ECF system maintained by the court which will provide notice to the following:

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